

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

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In re: : Chapter 9  
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CITY OF DETROIT, MICHIGAN : Case No. 13-53846  
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Debtor. : Hon. Steven W. Rhodes  
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**OAKLAND COUNTY’S ERRATA SHEET WITH RESPECT TO  
AMENDED MOTION TO EXCLUDE TESTIMONY OF MARTHA  
KOPACZ UNDER FED. R. EVID. 702 IN CONNECTION WITH CERTAIN  
OF HER EXPERT OPINIONS CONTAINED IN HER EXPERT REPORT**

**PLEASE TAKE NOTICE OF THE FOLLOWING:**

1. On August 22, 2014, Oakland County filed its *Motion to Exclude Testimony Of Martha Kopacz Under Fed. R. Evid. 702 In Connection With Certain Of Her Expert Opinions Contained In Her Expert Report* [Docket No. 6994] (the “Motion”).

2. Paragraph 6 of the Motion is corrected to state:

6. Underscoring Kopacz’s lack of pension expertise and/or proper testing of her conclusions, Kopacz testified at page 431 of her deposition transcript:

Q: And you have no prior ó pension is not your expertise, is it?

A: I would ~~now~~ not consider myself a pension expert.

3. Paragraph 8 of the Motion is corrected to state:

8. On page 539 of her deposition transcript, Ms. Kopacz testified:

Q: Do you have any understanding of what would be a typical smoothing period utilized by other public pension plans??

A: I don't.

Q: So, if someone from the retirement system told you that a seven (7) year smoothing period was used, you would have no basis to compare that with other plans to know if that was typical??

A: I would ó I would have to undertake to research that, I wouldn't have my own independent knowledge of what that was.

Q: Same with amortization period utilized by public pension system. Would you have any basis to know whether a twenty (20) year amortization period versus a thirty (30) year amortization period?

A: Or a ten (10) or a five (5)? No, I would not.

4. The last citation in Paragraph 12 is corrected to state:

12. ...*General Elec. Co. v. Joiner*, 522 U.S. at 146; ~~Tamraz~~ Tamraz v. *Lincoln Elec. Co.*, 620 F. 3d 665, 675-76 (6<sup>th</sup> Cir. 2010) (quoting *General Elec. Co. v. Joiner*).

5. The changes to the Motion, as reflected in this Errata Sheet, do not adversely affect any parties.

Dated: August 25, 2014

Respectfully Submitted,

*CARSON FISCHER, P.L.C.*

By: /s/ Joseph M. Fischer

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### **CERTIFICATE OF SERVICE**

I Joseph M. Fischer, hereby certify that the forgoing *Oakland County's Errata Sheet With Respect To Amended Motion To Exclude Testimony Of Martha Kopacz Under Fed. R. Evid. 702 In Connection With Certain Of Her Expert Opinions Contained In Her Expert Report* was filed and served via the Court's electronic case filing and noticing system on this 25<sup>th</sup> day of August, 2014.

/s/ Joseph M. Fischer

Joseph M. Fischer